

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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KENNETH CURRY, RICARDO MAZZITELLI :
and JACQUELINE BROWN-PILGRIM, :

Plaintiffs, :

- against - :

P&G AUDITORS AND CONSULTANTS, :
LLC, GRC SOLUTIONS, LLC, PGX, LLC and :
APPLE BANCORP, INC, :

Defendants :

- and - :

GRC SOLUTIONS, LLC and PGX, LLC, :

Crossclaim Plaintiffs, :

- against - :

KDC CONSULTING, LLC, KENNETH :
CURRY (IN HIS CAPACITY AS MANAGING :
MEMBER OF KDC CONSULTING, LLC), :
MAZZITELLI CONSULTING, LLC, :
MAZZITELLI CONSULTING :
INCORPORATED, BROPIL CONSULTING, :
LLC, JACQUELINE BROWN-PILGRIM (IN :
HER CAPACITY AS MANAGING MEMBER :
OF BROPIL CONSULTING, LLC), and :
DENNIS PILGRIM (IN HIS CAPACITY AS :
MANAGING MEMBER OF BROPIL :
CONSULTING, LLC), :

Crossclaim :
Defendants. :

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I, MELISSA TAYLOR, STATE AS FOLLOWS:

1. I am the Director of Operations for PGX, LLC (“PGX”). PGX provides administrative back-office support to GRC Solutions, LLC (“GRC”). Based on my review of PGX’s records as well as those of GRC, I am familiar with the agreements and other documents discussed in this declaration. I make this declaration based on the best of my personal knowledge,

Case No. 20-cv-06985 (LTS)(SLC)

**DECLARATION OF
MELISSA TAYLOR**

my review of PGX and GRC records kept in the ordinary course of business, and documents and information obtained by other PGX and GRC personnel in the course of their duties. I am competent to testify to the matters stated here.

2. Attached as Exhibit A is a *curriculum vitae* submitted by Ricardo Mazzitelli (“Mazzitelli”) to GRC in or around June 2017.

3. Due to the highly regulated nature of the financial services industry, GRC was required to conduct due diligence on all of the contractors with which it engaged. Attached as Exhibit B hereto are two pages of the background check search results obtained by GRC concerning Mazzitelli.

4. Attached as Exhibit C hereto is a Master Independent Contractor Agreement dated June 9, 2017 between GRC and Mazzitelli.

5. Attached as Exhibit D hereto is an Addendum to Master Subcontractor Agreement dated June 9, 2017 between GRC and Mazzitelli.

6. Attached as Exhibit E hereto is a form W-9 dated June 9, 2017 completed by Mazzitelli on behalf of Mazzitelli Consulting Incorporated and provided to GRC.

7. Attached as Exhibit F hereto is an Addendum to Master Subcontractor Agreement dated September 15, 2017 between GRC and Mazzitelli.

8. The BSA/AML Transaction Look Back Review project in connection with which Mazzitelli was providing services pursuant to the parties’ Master Subcontractor Agreement concluded in or around February 2018.

9. Mazzitelli stopped providing services pursuant to the parties’ Master Subcontractor Agreement on or around February 25, 2018.

10. Attached as Exhibit G is a *curriculum vitae* submitted by Kenneth Curry (“Curry”) to GRC in or around October 2017.

11. Attached as Exhibit H hereto are two pages of the background check search results obtained by GRC concerning Curry.

12. Attached as Exhibit I hereto is a Master Independent Contractor Agreement dated October 6, 2017 between GRC and KDC Consulting, LLC (“KDC”).

13. Attached as Exhibit J hereto are insurance certificates held by KDC, which were provided by Curry to GRC in or around October 2017.

14. Attached as Exhibit K hereto is a form W-9 dated October 9, 2017 completed by Curry on behalf of KDC and provided to GRC.

15. Curry stopped providing services pursuant to the Master Subcontractor Agreement between KDC and GRC on or around February 18, 2018.

16. Attached as Exhibit L hereto is correspondence from GRC to Apple Bank dated April 6, 2018.

17. In or around April 2018, PGX sought to engage contractors in connection with the proposal that GRC submitted to Apple Bank dated April 6, 2018. In connection with those efforts, it invited certain contractors to provide a summary of their services. Attached as Exhibit M hereto is a copy of KDC’s response to PGX’s request.

18. In connection with that process, PGX was required to conduct due diligence on all of the contractors with which it engaged. Attached as Exhibit N hereto is a background check authorization executed by Curry on behalf of KDC.

19. Attached as Exhibit O is a Statement of Work between KDC and PGX.

20. Curry provided services in connection with that Statement of Work from April 2018 to August 2018.

21. Attached as Exhibit P hereto is a copy of the document that PGX received in response to its invitation to Bropil Consulting LLC (“Bropil”) to provide a summary of its services.

22. Attached as Exhibit Q is a *curriculum vitae* submitted by Bropil to PGX in or around April 2018.

23. Attached as Exhibit R is a Master Service Agreement between Bropil and PGX.


24. Attached as Exhibit S is a Statement of Work between Bropil and PGX.

25. Attached as Exhibit T hereto is a background check authorization executed by Jacqueline Brown-Pilgrim (“Pilgrim”) on behalf of Bropil.

26. Pilgrim provided services in connection with the Statement of Work for three weeks, from April 2018 to May 2018, before she terminated Bropil’s agreement with PGX. During that time, she provided services for an average of 35.3 hours per week.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: South River, New Jersey.
1/30/2021

DocuSigned by:
By: 
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Melissa Taylor